

J Christopher Jorgensen
Nevada Bar No. 5382
LEWIS ROCA ROTHGERBER CHRISTIE LLP
3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169-5996
Tel: (702) 949-8200
Email: cjorgensen@lewisroca.com

Jayant W. Tambe (*pro hac vice*)
Laura Washington Sawyer (*pro hac vice*)
JONES DAY
250 Vesey Street
New York, NY 10281
Tel: (212) 326-3939
Email: jtambe@jonesday.com
lwsawyer@jonesday.com

Attorneys for Defendant Banco Santander, S.A.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CMB INFRASTRUCTURE GROUP IX, LP,
a California limited partnership; CMB
INFRASTRUCTURE GROUP XI, LP, a
California limited partnership; CMB
EXPORT, LLC, a Texas limited liability
company,

Plaintiffs,

vs.

COBRA ENERGY INVESTMENT
FINANCE, INC., a Delaware corporation,
COBRA ENERGY INVESTMENT, LLC, a
Delaware corporation, COBRA
INDUSTRIAL SERVICES, INC., a Delaware
corporation, COBRA THERMOSOLAR
PLANTS, INC., a Nevada corporation,
COBRA INSTALACIONES Y SERVICIOS
S.A., a Spanish corporation, ACS
SERVICIOS COMUNICACIONES Y
ENERGIA, S.L., a Spanish corporation,
BANCO SANTANDER, S.A., a Spanish
Corporation, TONOPAH SOLAR ENERGY,
LLC, a Delaware limited liability company,
and DOES I through 50, inclusive,

Defendants.

Case No. 2:21-cv-00214-JAD-DJA

**PLAINTIFFS AND DEFENDANT BANCO
SANTANDER, S.A.'S PROPOSED
STIPULATION RESULTING FROM THE
NOVEMBER 15, 2021 COURT ORDER
TO MEET AND CONFER**

1 Plaintiffs CMB Infrastructure Investment Group IX, LP, CMB Infrastructure Investment
 2 Group XI, LP, and CMB Export, LLC (collectively, “Plaintiffs”), by and through their attorneys of
 3 record, and Defendant Banco Santander, S.A. (“Santander”), by and through its respective attorneys
 4 of record, hereby stipulate as follows:

5 1. On November 15, 2021, this Court issued an Order Denying Motion to Remand;
 6 Resolving Motions to Dismiss; Granting in Part and Denying as Moot in Part Request for
 7 Jurisdictional Discovery; Granting Motion to Compel Arbitration; and Staying Case (hereinafter,
 8 “November 15 Order”) (ECF Doc. No. 70);

9 2. The November 15 Order granted Defendants’ motion to compel arbitration and
 10 stayed the remainder of this case, except to permit limited jurisdictional discovery as to Santander;

11 3. The November 15 Order directed Plaintiffs and Santander to meet and confer on the
 12 length and scope of limited jurisdictional discovery as to Defendant Santander and file a proposed
 13 scheduling order within ten days of the November 15 Order;

14 4. Plaintiffs and Santander met and conferred regarding the length and scope of limited
 15 jurisdictional discovery as to Defendant Santander on November 22, 2021;

16 5. Plaintiffs and Santander have agreed to stay temporarily any limited jurisdictional
 17 discovery as to Defendant Santander;

18 6. Plaintiffs and Santander stipulate that:

19 a. Jurisdictional discovery as to Santander shall be stayed for six months; and

20 b. On or before May 24, 2022, Plaintiffs and Santander shall submit a proposed
 21 scheduling order governing limited jurisdictional discovery as to Defendant
 22 Santander.

23 This is the Parties’ first request for a stay of limited jurisdictional discovery as to Defendant
 24 Santander, and is made before the expiration of any discovery schedule in this action. This

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1 Stipulation is made in good faith and is not intended for purposes of delay.

2 Dated this 24th day of November, 2021.

3
4 LEWIS BRISBOIS
BISGAARD & SMITH LLP

LEWIS ROCA
ROTHGERBER CHRISTIE LLP

5 /s/ John S. Poulos
6 John S. Poulos
7 Nevada Bar No. 154689
2020 W. El Camino Avenue, Suite 700
8 Sacramento, CA 95833
Tel. 916.564.5400

/s/ J Christopher Jorgensen
J Christopher Jorgensen
Nevada Bar No. 5382
Matthew R. Tsai
Nevada Bar No. 14290
3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169-599

9 John S. Poulos
Nevada Bar No. 15085
6385 South Rainbow Blvd., Suite 600
10 Las Vegas, NV 89118
Tel. 702.893.3383

Attorneys for Defendant
BANCO SANTANDER, S.A.

11 *Attorneys for Plaintiffs*
12 CMB INFRASTRUCTURE GROUP IX, LP; CMB
13 INFRASTRUCTURE GROUP XI, LP; and CMB
EXPORT, LLC

14
15 **ORDER**

16 IT IS SO ORDERED.

17 
18 DANIEL J. ALBREGTS
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: November 29, 2021

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of November, 2021, I caused a true and accurate copy of the foregoing document entitled **PLAINTIFFS AND DEFENDANT BANCO SANTANDER, S.A.'S PROPOSED STIPULATION RESULTING FROM THE NOVEMBER 15, 2021 COURT ORDER TO MEET AND CONFER** to be filed with the Clerk of the Court via the CM/ECF system, which will send an electronic copy to all interested parties.

/s/ Jessie M. Helm

An employee of Lewis Roca
Rothgerber Christie LLP